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COLLECTO, INC. dba EOS CCA
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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA
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12 REBECCA MCKEOWN,

13 Plaintiff,

14 vs.

15 COLLECTO, INC. dba EOS CCA, a
16 Massachusetts corporation; and
17 TRANSUNION, LLC, a foreign
limited liability company,

18 Defendants.
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20
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CASE NO. 2:18-cv-01707-JAD-NJK

**STIPULATION AND JOINT
REQUEST TO EXTEND TIME FOR
DEFENDANT COLLECTO, INC. TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

(First Request)

Complaint served: 9/13/18
Current response date: 10/4/18
Proposed new response date: 10/18/18

22 Plaintiff REBECCA MCKEOWN ("Plaintiff") and Defendant COLLECTO,
23 INC. dba EOS CCA ("Defendant EOS CCA"), through their respective counsel,
24 hereby stipulate and jointly request that Defendant EOS CCA shall have an
25 extension of time, up to and including October 18, 2018, within which to respond
26 to Plaintiff's Complaint on file herein. This is the first stipulation for an extension
27 of time for Defendant EOS CCA to respond to Plaintiff's Complaint. Defendant
28 EOS CCA has only recently retained counsel and needs more time to investigate

1 Plaintiff's claims. This joint request is also based on the fact that the requested
2 extension is relatively short, and the parties believe that no currently scheduled
3 Court hearing or other event will be impacted by the extension. The parties further
4 agree that the requested extension is made in good faith, and will not cause any
5 prejudice to them.

6 Respectfully submitted,

7
8 DATED: October 3, 2018 ALVERSON TAYLOR & SANDERS

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10 By: s/Trevor R. Waite
11 Kurt R. Bonds
12 Trevor R. Waite
13 Attorneys for Defendant
COLLECTO, INC. dba EOS CCA

14 DATED: October 3, 2018 COGBURN LAW OFFICES

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16 By: s/Jamie S. Cogburn
17 Jamie S. Cogburn
18 Erik W. Fox
19 Attorneys for Plaintiff
20 REBECCA MCKEOWN

21 IT IS SO ORDERED:

22
23 
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: October 4, 2018